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*Attorneys for Aviation Mall NewCo, LLC, Holyoke
Mall Company, L.P., JPMG Manassas Mall Owner
LLC, Poughkeepsie Galleria LLC, Salmon Run
Shopping Center, L.L.C., S&R Company of West
Seneca NewCo, LLC, Washington Commons
NewCo LLC, and DGI LS, LLC*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDING CORPORATION, *et al.*

Chapter 11
Case No. 18-23538-rdd
Jointly Administered

Debtors.

NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE, that the undersigned, appearing for Aviation Mall NewCo, LLC, Holyoke Mall Company, L.P., JPMG Manassas Mall Owner LLC, Poughkeepsie Galleria LLC, Salmon Run Shopping Center, L.L.C., S&R Company of West Seneca NewCo, LLC, Washington Commons NewCo LLC, and DGI LS, LLC (collectively hereafter the “Creditors”) pursuant to Section 1109(b) of the Bankruptcy Code and Rules 2002, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure, hereby requests that all notices given to or required to be served in this case be given and served upon the undersigned at the office, address and telephone numbers set forth below:

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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, orders and notices of any applications, motions, petitions, pleadings, complaints or demands transmitted or conveyed by mail delivery, telephone, telex or otherwise, which affect the Debtors or property of the Debtors.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby requests that the name and address set forth herein be added to the mailing matrix in this case.

PLEASE TAKE FURTHER NOTICE, that the Creditors intend that neither this Notice of Appearance, nor any former or later pleading, claim or suit shall waive (1) the Creditors' right to have final orders in non-core matters entered only after *de novo* review by a District Court Judge, (2) the Creditors' right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related in this case, (3) the Creditors' right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) the Creditors' right to have any claims constitutionally required to be determined by the District Court be determined therein, (5) the Creditors' right to have any matter heard by an arbitrator, or (6) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Creditors are or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Creditors expressly reserves.

Dated: October 18, 2018
Syracuse, New York

BARCLAY DAMON LLP
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By: /s/Kevin M. Newman
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